

DONALD W. CARLSON [Bar No. 79258]
JOYCE C. WANG [Bar No.: 121139]
WILLIAM J. HAPIUK [Bar No.: 220574]
CARLSON, CALLADINE & PETERSON LLP
353 Sacramento Street, 16th Floor
San Francisco, California 94111
Telephone: (415) 391-3911
Facsimile: (415) 391-3898

Attorneys for Defendant
RLI INSURANCE COMPANY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SHIMMICK CONSTRUCTION COMPANY,)
INC., a corporation,)

Plaintiff,)

vs.)

RLI INSURANCE COMPANY, a)
corporation, and DOES 1 through 100,)

Defendants.)

CASE NO.: C 08-02214 SBA

**JOINT STIPULATION AND
~~PROPOSED~~ ORDER RE EXTENSION
OF NON-EXPERT DISCOVERY CUT-
OFF AND DATES FOR EXPERT
DISCLOSURES**

PURSUANT TO CIVIL LOCAL RULE 6.2, IT IS HEREBY STIPULATED AND
AGREED by and between plaintiff Shimmick Construction Company, Inc. and defendant RLI
Insurance Company (collectively "the parties") through their respective counsel as follows:

1. The parties enter into this stipulation following their participation in an Early
Neutral Evaluation on December 9, 2009 and their agreement to participate in
further mediation in late February 2009 in an effort to resolve this litigation prior to
trial.
2. The parties believe that a 45-day extension of the cut-off for non-expert discovery
and slight adjustments to the disclosure dates for expert discovery would greatly
facilitate settlement discussions and will not require a change in any other
deadlines established by the Court, including the September 28, 2009 trial date.

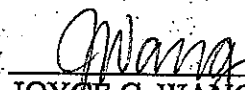
3. The parties have not previously sought any extensions of the deadlines set forth in the Court's September 11, 2008 Order for Pretrial Preparation.
4. The current non-expert discovery cut-off date of March 31, 2009 is hereby vacated and is re-set to **May 15, 2009**.
5. The current deadline for disclosure of the parties' respective experts of April 20, 2009 is hereby vacated and is re-set for **May 26, 2009**.
6. The current deadline for expert rebuttal disclosure of May 18, 2009 is hereby vacated and is re-set for **June 10, 2009**.
7. All other deadlines in the Court's September 11, 2008 Order for Pretrial Preparation are unchanged.

IT IS SO STIPULATED AND AGREED.

DATED: January 29, 2009

CARLSON, CALLADINE & PETERSON LLP

By

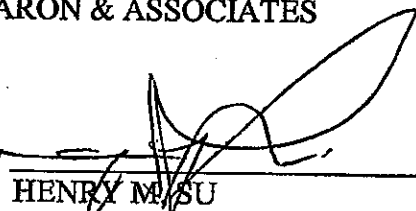


JOYCE C. WANG
Attorneys for Defendant
RLI INSURANCE COMPANY

DATED: January 29, 2009

YARON & ASSOCIATES

By



HENRY M. SU
Attorneys for Plaintiff
SHIMMICK CONSTRUCTION COMPANY,
INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 2/2/09



The Hon. Sandra Brown Armstrong
United States District Judge